

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

United States of America,

Plaintiff,

v.

Albert Rossini,

Defendant.

No. 17 CR 522

Judge John J. Tharp

Motion to Reset Sentencing

Defendant, Albert Rossini, by and through undersigned counsel, respectfully requests the court strike the sentencing hearing, which is currently scheduled for September 20, 2024.

Mr. Rossini was convicted on all counts in the above-captioned case after a jury trial in July 2023. Post-trial motions were denied in June 2024 [195].

Defense counsel has eight trials scheduled between today and the end of the year, including *USA v. Andrews* in front of Judge Chang starting on August 12, *Eggum v. Kowalis* in front of Cook County Law Division Judge Kubasiak, beginning August 26, *USA v. Smith* in front of Judge Kness beginning August 27, *USA v. Storme* in front of Judge Blakey beginning September 9, *USA v. Murray* in front of Judge Shah beginning on September 23, *USA v. Breal* in front of Judge Johnston beginning on October 7, *USA v. Young* in front of Judge DeGuilio of the Northern District of Indiana beginning on October 21, and *USA v. Grant* in front of Judge Bucklo beginning on November 4.

Mr. Rossini is currently serving a 132-month sentence on case number 15 CR 515 and as such, is no danger of overserving any additional sentence on this case.

Counsel consulted with Mr. Rossini and he has approved the request to reset his sentencing hearing.

Due to counsel's trial calendar, counsel is requesting that the court strike Mr. Rossini's current sentencing date to allow time to fully prepare mitigation for the court's consideration. Counsel will work with the court's staff and opposing counsel to set a new sentencing date.

Counsel reached out to AUSAs Paul Scheid and Patrick Mott on July 25, 2024, for the government's position on resetting Mr. Rossini's sentencing hearing but has not yet received a response.

WHEREFORE, counsel respectfully requests that the September 20, 2024, sentencing hearing be stricken in order to allow time for counsel to complete their trials and fully prepare mitigation prior to Mr. Rossini's sentencing in this case.

Respectfully Submitted,

/s/ Holly N. Blaine

Attorney for Albert Rossini

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